

Dan Call  
Technical Director  
1201 Millerton Street SE  
Canton Oh 44707  
dcall@ironrock.com

August 23, 2018

Mr. Brian Storey  
U.S. Environmental Protection Agency  
Sector Policies and Programs Division  
Office of Air Quality Planning and Standards  
109 T.W. Alexander Drive, Research Triangle Park  
NC 27709

Mr. Brian Storey:

Ironrock Capital Inc is submitting the following application for a one year extension.

Thank You,



Dan Call

**Request for Extension of Compliance**  
**40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants**  
**Brick and Structural Clay Products Manufacturing Source Category**

**I. General Information**

**A. Facility Information**

Facility Name Ironrock Capital Inc.

Facility Street Address 1201 Millerton Street SE

Facility Local Contact Name Dan Call Title Technical Director Phone (330)484-4887

City Canton

State Ohio

ZIP Code 44707

Operating Permit Number P0101219

Facility I.D. Number 1576051149

Responsible Official's Name/Title

Guy Renkert President / CEO

Street Address (if different from Facility Street Address)

City

State

ZIP Code

**B. Indicate the relevant standard or requirement for which you request a compliance extension:**

Title 40, Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing).

**II. Timeliness of Request**

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date (unless the elements are met for an alternative submittal date, as outlined in 40 C.F.R. § 63.6(i)). This request:

☒ (1) is being submitted on or before August 28, 2018 (120 days before the compliance deadline of December 26, 2018); or

☐ (2) is being submitted after August 28, 2018 but before December 26, 2018, because the need for the compliance extension arose after August 28, 2018, and the need arose due to circumstances beyond reasonable control of the owner or operator. An addendum may be included to explain the reasons for the delay in submittal.

*Note: A nonfrivolous request under (1) will stay the applicability of the rule as to the emission points in question until the request is granted or denied. A denial will be effective as of the date of denial or the original compliance date, whichever is later. A nonfrivolous request under (2) will stay the applicability of the rule as to the emission points in question until such time as the request is granted or denied.*

**III. Eligibility**

Are you eligible to apply for a compliance extension because you are unable to comply with the relevant standard by December 26, 2018 and need additional time for installation of controls (which includes time to achieve area source status)? 40 C.F.R. § 63.6(i)(4)(i)(A).

☒ Yes      ☐ No

The statutory authority for compliance extensions under Clean Air Act Section 112(i) includes adopting controls or limits necessary to qualify as a “synthetic minor” or “area” source.

#### IV. Compliance Schedule Information

- A. **Select the applicable approach described below (Option 1 or 2) that will be taken by your facility to achieve compliance within one year of the compliance date for the relevant standard (including, if applicable, actions necessary for your facility to qualify as a synthetic area source). 40 C.F.R. § 63.6(i)(6)(i)(A). At your option, you may provide additional detail in an attachment to this form.**

☐ This facility needs additional time to become an area source. This facility has submitted or will submit a permit application seeking an area source level emission limit, such that it will not be subject to the NESHAP. If you are installing physical controls, undertaking material substitution, or restricting operations to become an area source, you may describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as a request to eliminate any such limitation that has been issued if EPA revises the NESHAP such that compliance can be achieved by the facility without the need for an area source permit.

- B. **Describe your compliance schedule. 40 C.F.R. § 63.6(i)(6)(i)(B)(1)-(2).**

1. My facility will submit an application for any required permits by 6/1/2019.  
☒ Yes      ☐ No
2. If compliance is to be achieved through a means other than becoming an area source, the facility will begin on-site construction, installation of emission control equipment, or initiate a process change within 30 days of obtaining any required permits for such action. 40 C.F.R. § 63.6(i)(6)(i)(B)(1). If no permits are required for such action, the facility will initiate the activities as applicable by the dates specified below:
3. Any restriction on emissions, on-site construction, installation of emission control equipment, or a process change will be completed by December 26, 2019. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).

Comments : Additional information and justifications can be provided as requested.

4. Specify the date by which final compliance is to be achieved. 40 C.F.R. § 63.6(i)(6)(i)(B)(2).

Date: December 26, 2019.

Comments : Additional time between permit submission and final compliance is required to insure physical permit is in hand and etc.

- C. **You may provide additional information regarding your method of achieving compliance in an attachment to provide a fuller description of your control strategy than outlined above, as appropriate.**

## V. **Certification**

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this request is true, accurate, and complete.

Name of Responsible Official (Print or Type)                      Title  
Guy Renkert    President / CEO

Date  
8/23/2018

Signature of Responsible Official

